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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	2:13-CR-439-KJD-(VCF)
)	
JAMES WARRAS,)	
)	
Defendant.)	

**GOVERNMENT'S UNOPPOSED MOTION TO EXTEND THE TIME TO REPLY TO
WARRAS'S RESPONSE (ECF NO. 244) TO GOVERNMENT'S MOTION TO ENTER A
PRELIMINARY ORDER OF FORFEITURE WITH A CRIMINAL FORFEITURE MONEY
JUDGMENT OF \$4,920,000 (ECF NO. 235)
(First Request)**

The United States of America respectfully moves this Court for an Order extending the time for the government to reply to Warras's Response (ECF No. 244) to the motion to enter preliminary order of forfeiture with a criminal forfeiture money judgment of \$4,920,000 (ECF No. 235). The deadline for replying to the Response is February 22, 2016. The government requests an extension of time to and including March 7, 2016.

The grounds for extending the time are as follows.

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1 The undersigned counsel contacted Raquel Lazo, counsel for Warras, who agreed to the
2 extension of time. The undersigned has a large, active case load and, among other work, had civil seizure
3 warrants signed and executed this week, two of which were banks that first refused to honor the federal
4 court orders, requiring a full day to locate and to speak to the banks' contacts, who understood the
5 significance of the federal court orders.

6 This Motion is not submitted solely for the purpose of delay or for any other improper purpose.

7 This Court should grant an extension of time to, and including, March 7, 2016, for the United
8 States to reply to Warras's response (ECF No. 244).

9 DATED: February 19, 2016.

10 DANIEL G. BOGDEN
11 United States Attorney

12 /s/ Daniel D. Hollingsworth
13 DANIEL D. HOLLINGSWORTH
14 Assistant United States Attorney

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16 IT IS SO ORDERED:

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19 UNITED STATES DISTRICT JUDGE

20 DATED: February 23, 2016
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